

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SYMBOLOGY INNOVATIONS, LLC,

Plaintiff,

v.

**VALVE CORPORATION,
GEARBOX SOFTWARE, L.L.C.,**

Defendants.

CASE NO. 2:23-cv-419-JRG

JURY TRIAL DEMANDED

**DECLARATION OF RANDALL GARTEISER IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO VALVE CORPORATION'S MOTION TO DISMISS UNDER
RULE 12(B)(3)**

I, Randall T. Garteiser, declare as follows:

1. I am a partner at the law firm, Garteiser Honea, PLLC. We represent Plaintiff Symbology Innovations, LLC in this lawsuit. I have personal knowledge of the information contained in this declaration and can testify to the truth of these statements.

2. As Counsel for Patent Asset Management, LLC subsidiaries Symbology Innovations, LLC; Quantum Technology Innovations, LLC; and Social Positioning Input Systems, LLC, I asked Valve Corporation's Counsel if it would agree to not assert a licensing defense in this case due a licensing defense. Valve Corporation refused to stipulate that it would not raise a licensing defense in writing via email. Thus, as counsel for Plaintiff, I felt obligated to amend to add this waiver

argument as yet another basis for venue being proper in this district along with personal jurisdiction.

8. Attached hereto as Exhibit 1 is a true and correct copy of Global Settlement and Licensing Agreement with the just the amount of payment redacted, that I downloaded on or about April 10, 2024. In another case, I noticed that Discord, Inc. had filed a copy of the GSALA with no redactions other than the amount of the payment made under the agreement. In the past, after not filing the GSALA under seal, Valve Corporation's counsel reached out and obtained an agreement with counsel for at least Leigh Rothschild and Patent Asset Management, LLC to file the confidential GSALA agreement publicly with just the amount redacted. As such, Plaintiff attaches that publicly available version hereto as Exhibit 1, which Valve Corporation previously filed publicly in the Western District of Washington.

I declare under penalty of perjury under the laws of the United States of America on that the foregoing is true and correct.

Dated: April 22, 2024

Respectfully Submitted

/s/ Randall Garteiser

Randall Garteiser